

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

THOMAS POWER,

CIVIL DIVISION

Plaintiff,

Docket No.: 2:17-CV-00154-MRH

vs.

Hon. Mark R. Hornak

HEWLETT-PACKARD COMPANY,

Defendants.

**PLAINTIFF'S INITIAL DISCLOSURES PURSUANT TO
F.R.C.P. 26(a)(1)**

Plaintiff, Thomas Power, by and through his attorneys, Peter D. Friday, Esquire, Josh Licata, Esquire, Jesse A. Drumm, Esquire and Friday & Cox LLC, hereby submit Plaintiff's Initial Disclosures pursuant to the Federal Rule of Civil Procedures 26(a)(1):

I. WITNESSES RELEVANT TO DISPUTED FACTS

1. Thomas Power
c/o Friday & Cox LLC
1405 McFarland Road
Pittsburgh, PA 15216
Tele: (412) 561-4290
Fax: (412) 561-4291
pfriday@fridaylaw.com
jlicata@fridaylaw.com
jdrumm@fridaylaw.com

(Subjects of information include, but are not limited to, facts of the alleged incident and injuries, earning history, earning capacity, medical treatment and history, disability and physical condition, liability and causation.)

2. Unidentified Club Julian Fitness Employee (depicted in surveillance video)
Club Julian Fitness
101 Corbett Court
Pittsburgh, PA 15237
Tele: (412) 366-1931

(Subjects of information include, but are not limited to, facts of the alleged incident and injuries, liability and causation.)

3. Records Custodian & Patient Account Representative
Ross West View Emergency Medical Services
5325 Perry Highway
Pittsburgh, PA 15229
Tele: (412) 931-8200
Fax: (412) 931-6708

(Subjects of information include, but are not limited to, alleged injuries, disability and physical condition, medical treatment and history, and causation.)

4. Records Custodian & Patient Account Representative
UPMC Mercy Hospital
1400 Locust Street
Pittsburgh, PA 15219
Tele: (412) 232-8111
Fax: (412) 232-7583

(Subjects of information include, but are not limited to, alleged injuries, disability and physical condition, medical treatment and history, and causation.)

5. Records Custodian & Patient Account Representative
Peter A. Dickinson, M.D.
Gateway Medical Group-UPMC
1100 Washington Avenue, Suite 115
Carnegie, PA 15106
Tele: (412) 279-8940
Fax: (412) 279-8871

(Subjects of information include, but are not limited to, alleged injuries, disability and physical condition, medical treatment and history, and causation.)

6. Records Custodian & Patient Account Representative
Paul Dafe Ogagan, MD
UPMC McKeesport Painter Building
500 Hospital Drive, Suite 8, 3rd Floor
McKeesport, PA 15132
Tele: (412) 664-3392

(Subjects of information include, but are not limited to, alleged injuries, disability and physical condition, medical treatment and history, and causation.)

II. DISCOVERABLE DOCUMENTS RELEVANT TO DISPUTED FACTS

1. Screenshot of Paypal.com receipt evidencing plaintiff's purchase of the subject laptop, charger and lithium ion battery, attached hereto as **Exhibit A**.
2. Photographs taken by plaintiff of subject laptop and charger as described in plaintiff's complaint, attached hereto as **Exhibit B**.
3. Photographs taken by plaintiff of the labels on the bottom of the subject laptop as described in plaintiff's complaint, attached hereto as **Exhibit C**.
4. Photographs taken by plaintiff of the injuries to his lower extremities, attached hereto as **Exhibit D**.
5. Medical records of all providers listed above, attached hereto and marked as **Exhibit E**.
6. Pennsylvania Department of Human Services indicating no medical and/or cash assistance claim for this incident, attached hereto and marked as **Exhibit E**.
7. Medicare Secondary Payer Rights and Responsibilities letter, attached hereto and marked as **Exhibit F**.
8. X-ray images of the subject laptop taken by Churchwell Fire Consultants, Inc. and provided to plaintiff by defense counsel.

III. COMPUTATION OF DAMAGES

1. Non-Economic Damages:
 - A. Past and future pain, suffering, loss of enjoyment of life, and emotional distress in an unliquidated amount.
 - B. Damages for permanent scarring and disfigurement in an unliquidated amount.
 - C. Punitive Damages (to be determined, if applicable).
2. Economic Damages:
 - A. Out-of-Pocket medical expenses, including co-payments, co-insurance and deductibles.
 - B. Plaintiff's travel expenses to and from doctors' appointments.

3. Lost Future Earnings & Impairment of Earning Capacity:
 - A. Lost past and future earnings (to be determined by an economic loss expert).
 - B. Impairment of future earning capacity (to be determined by an economic loss expert).

Respectfully submitted,

FRIDAY & COX LLC

/s/ Peter D. Friday, Esquire

Peter D. Friday, Esquire

Pa I.D. # 48746

Attorney for Plaintiffs

Friday & Cox LLC

1405 McFarland Road

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(Counsel for Plaintiff)

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2017, a true and correct copy of the foregoing ***PLAINTIFF'S INITIAL DISCLOSURES PURSUANT TO F.R.C.P. 26(a)(1)*** was served via electronic mail and/ or the Court's Electronic Case Filing System upon the following parties, to-wit:

Michael A. Weiner, Esquire
Bennett, Bricklin & Saltzburg LLC
707 Grant Street, Suite 1800
Pittsburgh, PA 15219
weiner@bbs-law.com
(*Counsel for Defendants*)

Respectfully submitted,

FRIDAY & COX LLC

/s/ Peter D. Friday, Esquire
Peter D. Friday, Esquire
Pa I.D. # 48746
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